

DECLARATION OF TED CAMPBELL

I TED CAMPBELL, declare under the penalty of perjury of the laws of the United States of America as follows:

1. I am over the age of 18, I am a resident of Clark County, Nevada, and have personal knowledge of the matters contained herein, and can testify competently about the same. I am the Secretary of Empire Post Media. I was also a consultant for Empire Post Media, Inc
2. The controlling shareholder of Empire Post Media, Inc., a Nevada corporation (“EMPM”) was and is Saeon, Inc., a Nevada corporation (“Saeon”).
3. In the Summer of 2019, as majority shareholder, Saeon approved the proposed EMPM business plan of developing an off-road, electric vehicle business.
4. Contemporaneously, Saeon and Mr. Lee then installed the then current management team in the Summer of 2019 and executed a convertible promissory note in the amount of \$905,000 USD contemporaneously (the “Note”) to develop the approved business plan.
5. Saeon initially funded \$305,000 USD of the \$905,000 Note in August of 2019 (the “Initial Funding”), with the balance of \$605,000 USD to be received by EMPM from Saen during October 2019.
6. With the Initial Funding, EMPM and its management team entered into a long-term sublease on a large commercial building (approximately 10,000 square feet with showroom), purchased significant equipment and tools, hired employees and staff to further the business plan, and had completed initial development of an off-road electric prototype by December 2019.
7. Mr. John Lee visited the EMPM facility two times during the fall of 2019 and told the management team he approved all corporate actions by EMPM to date and made the first of many promises that the final investment of \$605,000 USD would be sent in no later than December 2019.
8. In a last-ditch effort to obtain the promised remaining financing from the Note signed by Saeon, Mr. William Sawyer and Ms. Tammy Billington (both then officers of EMPM) took a trip to visit Saeon and Mr. Lee in South Korea during the holiday season of late December 2019 and January 2020.
9. This trip to South Korea was completed to impress upon Saeon and Mr. Lee the dire circumstances that EMPM was in financially going into the new year of 2020 in a desperate attempt to get the final funding of \$605,000 USD on the Note as creditors, including the EMPM’s commercial landlords, were threatening legal action for rents due on the large facility that had been leased based upon promised funding of the Note by Saeon and Mr. Lee.

10. During this trip to South Korea as discussed above, Saeon and Mr. Lee made further promises of meeting Saeon's funding obligations under the Note.
11. During the first quarter of 2020, Saeon and Mr. Lee continued to make the same promises of completing the funding of the Note until the management team had no choice but to file a lawsuit against Saeon due to its financial predicament caused by Saeon's failure to complete the funding of the Note.
12. The lawsuit against Saeon was filed on April 12, 2020, in direct response to EMPM being threatened with legal actions by its creditors, and the fact we no longer believed that Saeon, EMPM's largest shareholder, would complete the funding of the Note as contractually obligated to do so.
13. It is important to note that at no time before April 12, 2020, did Saen, Mr. Lee, or any other representative of the same send a letter or email to EMPM or its current management alleging mismanagement of the Initial Funding by the current management team of EMPM.
14. This mismanagement of funds statement by the current management team, expressed now in many filings by Saeon with this court, is a convenient defense to the breach of the terms of the Note by Saeon.
15. Again, Mr. Lee, the CEO of Saeon, again took two trips to the facility in the fall of 2019 and at such times, expressed his enthusiasm with what had been accomplished to date and pushed the management team forward with additional spending requests and the numerous broken promises that the remaining \$605,000 USD of the Note due to EMPM would be invested shortly.

I Declare under penalty of perjury pursuant to the laws of the United States of America that the foregoing is true and correct.

Executed this _23__day of June 2021.

/s/ Ted Campbell

Ted Campbell